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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	CASE NO. 2:19-CR-000222-KJD-BNW
vs.	)	
LANCE K. BRADFORD,	)	
Defendant,	)	

**STIPULATION AND ORDER TO ALLOW DEFENDANT BRADFORD  
TO RETAIN HIS PASSPORT BETWEEN FOREIGN TRIPS**

IT IS HEREBY STIPULATED and AGREED by and between the United States of America, by and through NICHOLAS TRUTANICH, United States Attorney, and STEVEN W. MYHRE, Assistant United States Attorney, and Defendant LANCE K. BRADFORD, by and through his counsel, RUSSELL E. MARSH, ESQUIRE, that the conditions of Mr. Bradford's Pretrial Release be modified to allow him to retain possession of his passport between his trip to Mexico in June 2020 and his planned trip to the Bahamas in July 2020 and return the passport after the second trip.

The parties state and agree as follows:

1. On September 3, 2019, Mr. Bradford appeared pursuant to a Summons, and was released on a PR Bond. (ECF No.7.) Mr. Bradford was ordered to surrender his passport and his travel was restricted to the continental U.S. unless approved by Pretrial Services. (*Id.* at 3). Mr. Bradford's trial in this matter is currently set for November 16, 2020. (ECF No. 17).

2. On May 29, 2020, this Court signed an Order allowing Mr. Bradford to obtain his passport to travel to the Caribbean for up to ten (10) days in July 2020 for a planned trip to the Bahamas. The Order requires Mr. Bradford to return his passport to Pretrial Services within two business days of his return. (ECF No. 25.)

3. On June 11, 2020, this Court signed an Order allowing Mr. Bradford to obtain his passport to travel to Mexico for up to one week in June 2020 for a business trip. The Order again requires Mr. Bradford to return his passport to Pretrial Services within two business days of his return. (ECF No. 29.)

4. Mr. Bradford is currently scheduled to return from Mexico on June 30, 2020. Mr. Bradford is then scheduled to leave for the Bahamas on July 10, 2020. Mr. Bradford requests that he be able to keep possession of his passport between those dates.

5. The parties agree that the conditions of Mr. Bradford's pretrial release be modified to allow him to retain his passport between the two trips. One of the reasons for this agreement is to avoid unnecessary personal contact between Mr. Bradford and Pretrial Services during the COVID-19 situation. Mr. Bradford will return the passport to U.S. Pretrial Services when he returns to the United States from the Bahamas in July 2020.

6. Pretrial Services agrees with these changes in Mr. Bradford's conditions of release. Mr. Bradford's Pretrial Services Officer Jessie Moorehead has reviewed and approved this Stipulation and Order.

7. The parties agree that all other conditions of Mr. Bradford's release will remain in full force and effect.

Dated this 26th day of June, 2020.

WRIGHT MARSH & LEVY

BY /s/ Russell E. Marsh  
RUSSELL E. MARSH  
Attorneys for Defendant Bradford

Respectfully submitted,

NICHOLAS TRUTANICH  
UNITED STATES ATTORNEY

BY /s/ Steven W. Myhre  
STEVEN W. MYHRE  
Assistant U.S. Attorney

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**ORDER**

Based on the Stipulation between the Defendant, Lance K. Bradford, and the Government, through counsel, and good cause appearing,

**IT IS HEREBY ORDERED** that the conditions of Defendant Bradford's pretrial release be modified as follows:

1. Mr. Bradford may retain his passport after he returns from Mexico in June 2020 for the purpose of additional foreign travel during the month of July 2020.
2. Mr. Bradford will provide his passport to Pretrial Services within two business days of his return to the United States from his trip to the Caribbean in July 2020.
3. All other conditions of Pretrial Supervision remain in effect.

IT IS SO ORDERED.

Dated: June 26, 2020.

  
ELAYNA J. YOUCHAY  
UNITED STATES MAGISTRATE JUDGE